

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KONINKLIJKE PHILIPS N.V. and)
PHILIPS LIGHTING NORTH AMERICA)
CORP.,)
Plaintiffs,) CIVIL ACTION NO. 14-cv-12298
v.) JUDGE DENISE J. CASPER
WANGS ALLIANCE CORPORATION)
d/b/a WAC LIGHTING CO.,)
Defendant.)

**DEFENDANT WAC LIGHTING CO.'S MOTION TO COMPEL THE DEPOSITION OF
MARC OLIVIER FLAISSIER OR IN THE ALTERNATIVE FOR APPROPRIATE
RELIEF**

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37.1, Defendant Wangs
Alliance Corporation d/b/a WAC Lighting Co. (“WAC”) respectfully requests an order
compelling Plaintiffs Koninklijke Philips N.V. and Philips Lighting North America (collectively,
“Philips”) to produce Marc Olivier Flaissier, named inventor on U.S. Patent 6,561,690 for
deposition or in the alternative issuing appropriate sanctions. In support of its motion, WAC
submits herewith a Memorandum in Support of Its Motion to Compel The Deposition of Marc
Olivier Flaissier or in the Alternative for Appropriate Relief and the Declaration of Eta Lahav In
Support of WAC’s Memorandum in Support of Its Motion to Compel The Deposition of Marc
Olivier Flaissier or in the Alternative for Appropriate Relief. WAC respectfully requests this
motion be granted.

Dated: June 23, 2017

Respectfully submitted,

/s/ Etai Lahav

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Attorneys for Defendant WAC Lighting Co.

CERTIFICATE OF CONSULTATION

I, Etai Lahav, hereby certify that in accordance with Local Rules 7.1(a)(2) and 37.1(a), counsel for Plaintiffs and counsel for Defendant met and conferred regarding resolution of this motion on Tuesday, May 30, 2017 at approximately 11:00am eastern via telephone, but were not able to reach agreement.

/s/ Etai Lahav
Etai Lahav

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Defendant WAC Lighting Co. respectfully requests oral argument regarding this motion to the extent that the Court believes that oral argument will assist it in resolving this motion.

CERTIFICATE OF SERVICE

I, Etaï Lahav, hereby certify that a true copy of the above document was served upon counsel of record for the Plaintiff through the Court's electronic court filing (ECF) system, this June 23, 2017.

/s/ Etaï Lahav
Etaï Lahav